

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA

v.

GARY OWENS JR.

*Defendant.*

**UNDER SEAL**

Case No. 2:24mj86

**AFFIDAVIT IN SUPPORT OF A  
CRIMINAL COMPLAINT AND AN ARREST WARRANT**

I, Matthew E. Lee, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and I have been so employed since 2017. I am currently assigned to the Washington Field Office's Child Exploitation and Human Trafficking Task Force located at the Northern Virginia Resident Agency. As a Special Agent, I investigate federal violations concerning kidnapping, child pornography, the sexual exploitation of children, human trafficking, and related offenses. I have gained experience through training and work related to conducting these types of investigations.

2. I am a law enforcement officer who is engaged in enforcing criminal laws, including offenses in violation of 18 U.S.C. §§ 2422 (coercion and enticement), 2251 (sexual abuse of minors), and 2252 (transportation, receipt, distribution, and possession of child pornography). As such, I am authorized to investigate violations of laws of the United States, and as a law enforcement officer I am authorized to execute arrest warrants issued under the authority of the United States.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, witnesses, and agencies. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and does not set for all my knowledge about this matter.

4. I submit this affidavit in support of a criminal complaint and arrest warrant charging GARY OWENS JR. ("OWENS") with (1) the sexual exploitation and attempted sexual exploitation of children, in violation of 18 U.S.C. § 2251(a) and (e); and (2) the coercion and enticement, and attempted coercion and enticement of a minor, in violation of 18 U.S.C. § 2422(b). Specifically, between on or about February 20, 2022, and on or about October 31, 2022, while residing in the Eastern District of Virginia, OWENS used an Internet-enabled messaging application to knowingly persuade, induce, entice, and/or coerce a minor under the age of eighteen years old located in the Eastern District of Virginia to produce child pornography. Furthermore, on or about October 31, 2022, OWENS employed, used, persuaded, induced, enticed, and/or coerced a minor under the age of eighteen (who also resided in the Eastern District of Virginia) to engage in sexually explicit conduct for the purpose of producing a sexual depiction of such conduct. In other words, there is probable cause to believe that OWENS did knowingly coerce and entice a minor, and then did cause that minor to produce child pornography at his direction.

#### **STATUTORY AUTHORITY AND DEFINITIONS**

5. 18 U.S.C. § 2251(a) prohibits any person to employ, use, persuade, induce, entice, or coerce any minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign

commerce or in or affecting interstate or foreign commerce or mailed; if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer; or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed. Subsection (e) prohibits an attempt to engage in this conduct.

6. 18 U.S.C. § 2422(b) prohibits the use of any facility or means of interstate or foreign commerce to knowingly persuade, induce, entice, or coerce any individual who has not attained the age of 18 years to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or any attempt to do so.

7. The term “minor,” as defined in 18 U.S.C. § 2256(1), means any person under the age of 18 years.

8. The term “sexually explicit conduct,” as defined in 18 U.S.C. § 2256(2)(A)(i)–(v), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person.

9. The term “visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data that is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

10. The term “child pornography,” as defined in 18 U.S.C. § 2256(8), is any visual depiction, including any photograph, film, video, picture, or computer or computer-generated

image or picture, whether made or produced by electronic, mechanical or other means, of sexually explicit conduct, where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct; (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct; or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

11. An Internet Protocol address (or simply “IP address”) is a unique alphanumeric address used by computers on the Internet. An IP address is a series of numbers and letters. Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.

### **BACKGROUND ON KIK**

16. As described below in greater detail, OWENS used the messaging application “Kik” to communicate with numerous minors. According to Kik’s website, Kik is an application that lets users “*connect with friends and groups from all around the world through messaging, chatting and live streaming.*” Kik users can exchange text, images, videos, and more with Kik’s messenger function.

17. Kik offers users the ability to create an identity within the app referred to as a username. This username is unique to the account and cannot be changed. No one else can utilize the same username. A Kik user would have to create a new account to obtain a different username. The username for a particular Kik account holder is displayed in their Kik profile.

18. I know, based on my training and experience, that individuals who use the Internet to sexually exploit children often use Kik because of the perceived anonymity of the Kik application. For example, according to Kik's website, "*as a security measure, when you log out of your account, your chat messages are automatically cleared. Once you log in again, your contacts and list of chats in your main chat list will appear as you left them before logging out.*"

19. The Kik messaging application uses the Internet to connect its users. Accordingly, when Kik users communicate, they do so through the Internet.

### **STATEMENT OF PROBABLE CAUSE**

20. On or about July 27, 2022, the social media company Meta submitted information to the National Center for Missing and Exploited Children (NCMEC) regarding the potential extortion of a minor (hereafter, "Minor Victim 1" or "MV1") on Instagram. NCMEC compiled this information into a CyberTip ("CT") Report and provided the FBI with pictures of MV1 that were associated with the potential extortive conversation.

21. On or about December 9, 2022, I interviewed Minor Victim 1's parents, who confirmed that the person in one of the pictures associated with the CT Report was their child, MV1. At the time of this interview, MV1 was 17 years old. Additionally, at all times relevant to the facts in this affidavit, MV1 and his parents lived in Gainesville, Virginia, which is in the Eastern District of Virginia.

22. On or about December 12, 2022, MV1's parents provided their consent for the FBI to search MV1's phone and provided the phone to the FBI. Later that same day, FBI personnel extracted the digital contents of the phone for my further review.

23. While reviewing MV1's phone, I located a conversation between MV1 and another user on Kik, which occurred on or about October 31, 2022. This conversation was unrelated to the attempted extortion of Minor Victim 1 as reported in the CT Report.

24. The username of the person with whom MV1 communicated on Kik was "misslincon." As described in more detail below, I believe OWENS was the person controlling this account while posing as a female close in age to MV1. However, OWENS is a male and was 40 years old at the time of this conversation. Minor Victim 1 was 17 years old at the time of this conversation. Relevant portions of the conversation are transcribed below.<sup>1</sup>

Minor Victim 1: *hey*

Misslincon: *hey wyd bby*

Minor Victim 1: *nothin*

Minor Victim 1: *u go first ok bby*

Misslincon: *what you got on bby*

Minor Victim 1: *nothing*

Minor Victim 1: *wbu*

Misslincon: *you're lying*

Minor Victim 1: *well i got underwear on but like basically nothing*

Misslincon: *lemme see*

25. At "misslincon's" direction, MV1 sent a picture to "misslincon," which shows his legs and the bottom of his torso as he appears to be under a blanket. In the picture, MV1's underwear is shown. The conversation then continued as follows:

Misslincon: *want me to suck you*

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<sup>1</sup> All quotations transcribed herein are provided verbatim as in the original including all errors.

Minor Victim 1: *yes*

Misslincon: *make it move krnmrcsee*

Misslincon: *lemme see*

Minor Victim 1: *u gotta send something first*

26. “Misslincon” then sent a picture to MV1. The picture shows a nude white female on her knees facing the camera as the female leans forward and rests on her elbows. The photo shows a portion of the female’s face, her back, and her bare buttocks. In the picture, the female’s chest is close to the ground as she leans forward. The conversation then continued as follows:

Misslincon: *uh huh*

Minor Victim 1: *hot asf*

Misslincon: *make it move bby*

Minor Victim 1: *its not hard enough yet u gotta send me ur tits or something*

Misslincon: *get me wetter lemme see you head to toe laying in bed in undies on video*

27. At “misslincon’s” direction, MV1 sent a video to “misslincon.” I have reviewed this video in its entirety. The video, which lasts approximately four seconds, shows a male’s body with underwear on as the male lies on what appears to be a bed. The blankets and the underwear shown in this video appear to match the blankets and underwear shown in the picture MV1 had previously sent to “misslincon.” The conversation then continued as follows:

Misslincon: *you wanna fuck me bby*

Minor Victim 1: *yes ofc*

Misslincon: *raw or no*

Minor Victim 1: *u wanna fuck me?*

Minor Victim 1: *and raw fs*

Misslincon: *yes bby*

Misslincon: *take ur undies off lemme watch idc if it's soft we will make it hard*

Minor Victim 1: *ok bby*

28. Again, in response to the direction provided by “misslincon,” MV1 sent a video to “misslincon.” The video, which I have reviewed in its entirety, lasts approximately eight seconds and appears to show the same male as described above. In this video, the male removes his underwear, thus exposing his erect penis to the camera. The conversation then continued as follows:

Minor Victim 1: *alr now i need to see some of that wet pussy*

Misslincon: *mmmm bby lemme see you jerk it*

Minor Victim 1: *pussy first i gotta have something to jerk to*

29. “Misslincon” then sent another picture to MV1. This picture shows a nude white female. In the picture, the female is standing in front of the camera while facing away from the camera and bending over slightly at the waist, thus exposing her bare buttocks and vagina to the camera. The female in the picture is standing in front of a mirror, with her reflection also visible to the camera. The female’s reflection shows her bare breasts and her mouth open with her tongue out of her mouth. The conversation then continued as follows:

Misslincon: *like this bby*

Minor Victim 1: *yes bby ur so hot*

Misslincon: *jerk it bby lemme watch*

30. Once again, at the direction of “misslincon,” MV1 sent a video. I have reviewed this video in its entirety. The video, which lasts approximately seven seconds, shows a male using his hand to masturbate his erect penis. Based on the background in the video, including



the blankets on the bed, I believe the male in this video is the same person shown in the video and picture that MV1 had previously sent as described above. The conversation then continued as follows:

Minor Victim 1: *let me see u finger urself*

Misslincon: *mmmmm you're huge bby*

Minor Victim 1: *thank you bby*

Minor Victim 1: *u still there?*

Misslincon: *my mom woke up*

Misslincon: *hang on a bit*

Minor Victim 1: *just be quiet*

Minor Victim 1: *send me something*

Misslincon: *I am being quiet but i gotta chill*

Minor Victim 1: *nah send something bruh*

Misslincon: *bro you want me to get caught on this too haha*

Minor Victim 1: *no but like just be quiet its not hard*

Misslincon: *yeah but she can walk in my room any minute to see what i'm doing*

Minor Victim 1: *why would she tho*

Misslincon: *bro cuz she's caught me sending before lol*

Minor Victim 1: *ok but like just be quick with it*

Minor Victim 1: *listen so u stop if shes coming*

Misslincon: *bro lol you'll get one more*

Minor Victim 1: *ok*

31. “Misslincon” then sent another picture to MV1. This picture shows a nude white female with her breasts and torso exposed. A small portion of the female’s face and the top of her pubic area can be seen in the picture. The conversation then continued as follows:

Misslincon: *i wanna feel you inside me*

Minor Victim 1: *i wanna be inside of u bby*

Misslincon: *me too will you cum in me*

Minor Victim 1: *yes ofc bby*

Minor Victim 1: *we should meet up sometime and do it*

Minor Victim 1: *u make me so horny*

Misslincon: *that would be hot babe*

Minor Victim 1: *oh yea fs*

Misslincon: *you gonna cum*

Minor Victim 1: *i did bc i got on the hub<sup>2</sup>*

Minor Victim 1: *since u left*

Misslincon: *how was it*

Minor Victim 1: *good fs*

Misslincon: *is it still there can i see it*

Minor Victim 1: *sure*

Misslincon: *ok*

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<sup>2</sup> Based on training and experience and the context of this conversation, I believe Minor Victim 1 said “the hub” in reference to a popular pornography website, Pornhub.

32. At “misslincon’s” direction, MV1 sent another picture. This picture shows a red and blue towel with a white liquid on it. Based on the context of the conversation, I believe the liquid on the towel is MV1’s semen. The conversation then continued as follows:

Misslincon: *damn you ever cum on your chest babe*

Minor Victim 1: *yea i have*

33. On or about January 6, 2023, an FBI child adolescent forensic interviewer interviewed Minor Victim 1. During that interview, MV1 discussed the conversation with “misslincon.” Minor Victim 1 advised that “misslincon” was someone he met online approximately two years before the interview. Minor Victim 1 was 17 years old at the time of this interview and was approximately 15 years old at the time he met “misslincon” online.

34. Minor Victim 1 advised that he knew the user of the “misslincon” Kik account as “Jessica Lincon.” Minor Victim 1 also advised that, although he could not remember on what platform he initially met “Lincon,” he had communicated with her on multiple communication platforms, including Kik.

35. Minor Victim 1 advised that he did not remember the exact point at which his relationship with “Lincon” turned sexual, but eventually they got to the point where they would simply contact each other and request sexual content. During the interview, MV1 identified himself in screenshots taken from the videos he sent in the conversation described above, including a screenshot from the video in which MV1 masturbated his penis with his hand. Minor Victim 1 advised that he only sent this video to “Lincon.”

36. In October 2023, a member of the FBI’s Child Exploitation and Human Trafficking Task Force (CEHTTF) identified the individual in the pictures sent by “misslincon” to MV1 as an individual identified herein as JANE DOE. The investigation has revealed that

content of JANE DOE can be found on various pornography websites. The content of JANE DOE on these websites appears visually similar to the Kik profile picture for “misslincon.”

37. A member of the CEHTTF was then able to fully identify JANE DOE as a woman who, in October 2022 (*i.e.* when Kik user “misslincon” communicated with MV1 as described above), was 21 years old. JANE DOE is originally from New York, and in October 2023, JANE DOE lived in Florida. As described in more detail below, the “misslincon” Kik account was accessed on multiple occasions from IP addresses that resolved to the Southeast Virginia area. The CEHTTF has identified no information that indicated JANE DOE has ever lived in Southeast Virginia. Based on my training and experience and these facts as well as additional facts learned in the investigation set forth below, the person using the “misslincon” Kik account (*i.e.*, OWENS) was using JANE DOE’s publicly available photos to “catfish”<sup>3</sup> MV1.

#### *Identification of Owens*

38. On or about December 29, 2022, a member of the CEHTTF served an administrative subpoena on Kik for records associated with the Kik user “misslincon.” According to the records provided by Kik in response, on or about December 14 and 15, 2022, the “misslincon” Kik account was accessed from the IP address 72.214.52.41.

39. On or about January 5, 2023, a member of the CEHTTF served an administrative subpoena on Cox Communications for subscriber records associated with this IP address. According to the records provided by Cox Communications in response, the IP address

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<sup>3</sup> According to dictionary.cambridge.org, “catfishing” is “the practice of pretending on social media to be someone different, in order to trick or attract another person.”

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**INTRODUCTION**

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#### **STATUTORY AUTHORITY AND DEFINITIONS**

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commerce or in or affecting interstate or foreign commerce or mailed; if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer; or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed. Subsection (e) prohibits an attempt to engage in this conduct.

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9. The term “visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data that is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

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image or picture, whether made or produced by electronic, mechanical or other means, of sexually explicit conduct, where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct; (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct; or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

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### **BACKGROUND ON KIK**

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Minor Victim 1: *hey*

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Minor Victim 1: *nothin*

Minor Victim 1: *u go first ok bby*

Misslincon: *what you got on bby*

Minor Victim 1: *nothing*

Minor Victim 1: *wbu*

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27. At “misslincon’s” direction, MV1 sent a video to “misslincon.” I have reviewed this video in its entirety. The video, which lasts approximately four seconds, shows a male’s body with underwear on as the male lies on what appears to be a bed. The blankets and the underwear shown in this video appear to match the blankets and underwear shown in the picture MV1 had previously sent to “misslincon.” The conversation then continued as follows:

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Misslincon: *take ur undies off lemme watch idc if if it's soft we will make it hard*

Minor Victim 1: *ok bby*

28. Again, in response to the direction provided by “misslincon,” MV1 sent a video to “misslincon.” The video, which I have reviewed in its entirety, lasts approximately eight seconds and appears to show the same male as described above. In this video, the male removes his underwear, thus exposing his erect penis to the camera. The conversation then continued as follows:

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the blankets on the bed, I believe the male in this video is the same person shown in the video and picture that MV1 had previously sent as described above. The conversation then continued as follows:

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Misslincon: *I am being quiet but i gotta chill*

Minor Victim 1: *nah send something bruh*

Misslincon: *bro you want me to get caught on this too haha*

Minor Victim 1: *no but like just be quiet its not hard*

Misslincon: *yeah but she can walk in my room any minute to see what i'm doing*

Minor Victim 1: *why would she tho*

Misslincon: *bro cuz she's caught me sending before lol*

Minor Victim 1: *ok but like just be quick with it*

Minor Victim 1: *listen so u stop if shes coming*

Misslincon: *bro lol you'll get one more*

Minor Victim 1: *ok*

31. “Misslincon” then sent another picture to MV1. This picture shows a nude white female with her breasts and torso exposed. A small portion of the female’s face and the top of her pubic area can be seen in the picture. The conversation then continued as follows:

Misslincon: *i wanna feel you inside me*

Minor Victim 1: *i wanna be inside of u bby*

Misslincon: *me too will you cum in me*

Minor Victim 1: *yes ofc bby*

Minor Victim 1: *we should meet up sometime and do it*

Minor Victim 1: *u make me so horny*

Misslincon: *that would be hot babe*

Minor Victim 1: *oh yea fs*

Misslincon: *you gonna cum*

Minor Victim 1: *i did bc i got on the hub<sup>2</sup>*

Minor Victim 1: *since u left*

Misslincon: *how was it*

Minor Victim 1: *good fs*

Misslincon: *is it still there can i see it*

Minor Victim 1: *sure*

Misslincon: *ok*

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<sup>2</sup> Based on training and experience and the context of this conversation, I believe Minor Victim 1 said “the hub” in reference to a popular pornography website, PornHub.

32. At “misslincon’s” direction, MV1 sent another picture. This picture shows a red and blue towel with a white liquid on it. Based on the context of the conversation, I believe the liquid on the towel is MV1’s semen. The conversation then continued as follows:

Misslincon: *damn you ever cum on your chest babe*

Minor Victim 1: *yea i have*

33. On or about January 6, 2023, an FBI child adolescent forensic interviewer interviewed Minor Victim 1. During that interview, MV1 discussed the conversation with “misslincon.” Minor Victim 1 advised that “misslincon” was someone he met online approximately two years before the interview. Minor Victim 1 was 17 years old at the time of this interview and was approximately 15 years old at the time he met “misslincon” online.

34. Minor Victim 1 advised that he knew the user of the “misslincon” Kik account as “Jessica Lincon.” Minor Victim 1 also advised that, although he could not remember on what platform he initially met “Lincon,” he had communicated with her on multiple communication platforms, including Kik.

35. Minor Victim 1 advised that he did not remember the exact point at which his relationship with “Lincon” turned sexual, but eventually they got to the point where they would simply contact each other and request sexual content. During the interview, MV1 identified himself in screenshots taken from the videos he sent in the conversation described above, including a screenshot from the video in which MV1 masturbated his penis with his hand. Minor Victim 1 advised that he only sent this video to “Lincon.”

36. In October 2023, a member of the FBI’s Child Exploitation and Human Trafficking Task Force (CEHTTF) identified the individual in the pictures sent by “misslincon” to MV1 as an individual identified herein as JANE DOE. The investigation has revealed that

content of JANE DOE can be found on various pornography websites. The content of JANE DOE on these websites appears visually similar to the Kik profile picture for “misslincon.”

37. A member of the CEHTTF was then able to fully identify JANE DOE as a woman who, in October 2022 (*i.e.* when Kik user “misslincon” communicated with MV1 as described above), was 21 years old. JANE DOE is originally from New York, and in October 2023, JANE DOE lived in Florida. As described in more detail below, the “misslincon” Kik account was accessed on multiple occasions from IP addresses that resolved to the Southeast Virginia area. The CEHTTF has identified no information that indicated JANE DOE has ever lived in Southeast Virginia. Based on my training and experience and these facts as well as additional facts learned in the investigation set forth below, the person using the “misslincon” Kik account (*i.e.*, OWENS) was using JANE DOE’s publicly available photos to “catfish”<sup>3</sup> MV1.

#### *Identification of Owens*

38. On or about December 29, 2022, a member of the CEHTTF served an administrative subpoena on Kik for records associated with the Kik user “misslincon.” According to the records provided by Kik in response, on or about December 14 and 15, 2022, the “misslincon” Kik account was accessed from the IP address 72.214.52.41.

39. On or about January 5, 2023, a member of the CEHTTF served an administrative subpoena on Cox Communications for subscriber records associated with this IP address. According to the records provided by Cox Communications in response, the IP address

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<sup>3</sup> According to dictionary.cambridge.org, “catfishing” is “the practice of pretending on social media to be someone different, in order to trick or attract another person.”



72.214.52.41 was assigned to the Courts at Yorkshire, LLC with an address in Yorktown, Virginia. This address is within the Eastern District of Virginia.

40. The Courts at Yorkshire, VA is an apartment complex. Because the IP address 72.214.52.41 was assigned to the entire apartment complex and not a particular resident within the complex, the FBI was not able to identify the user of the “misslincon” account based on this information alone.

41. Accordingly, on or about September 13, 2023, a member of the CEHTTF served an administrative subpoena on Kik for updated records and IP logs associated with the “misslincon” Kik account. According to the records provided by Kik in response, the “misslincon” Kik account was accessed from the IP address 75.249.216.181 at 11:12pm UTC. Additionally, on or about August 22, 2023, the “misslincon” Kik account was accessed from the IP address 75.249.216.181 at 4:21am UTC<sup>4</sup>.

42. On or about September 20, 2023, a member of the CEHTTF served an administrative subpoena on Verizon for records associated with this IP address. According to the records provided by Verizon in response, at 11:12pm on August 20, 2023, and at 4:21am on August 22, 2023, the IP address 75.249.216.181 was assigned to OWENS at a residence in Suffolk, Virginia (the “Suffolk Residence”). This is the same address listed on OWENS’ Virginia driver’s license and is located in the Eastern District of Virginia.

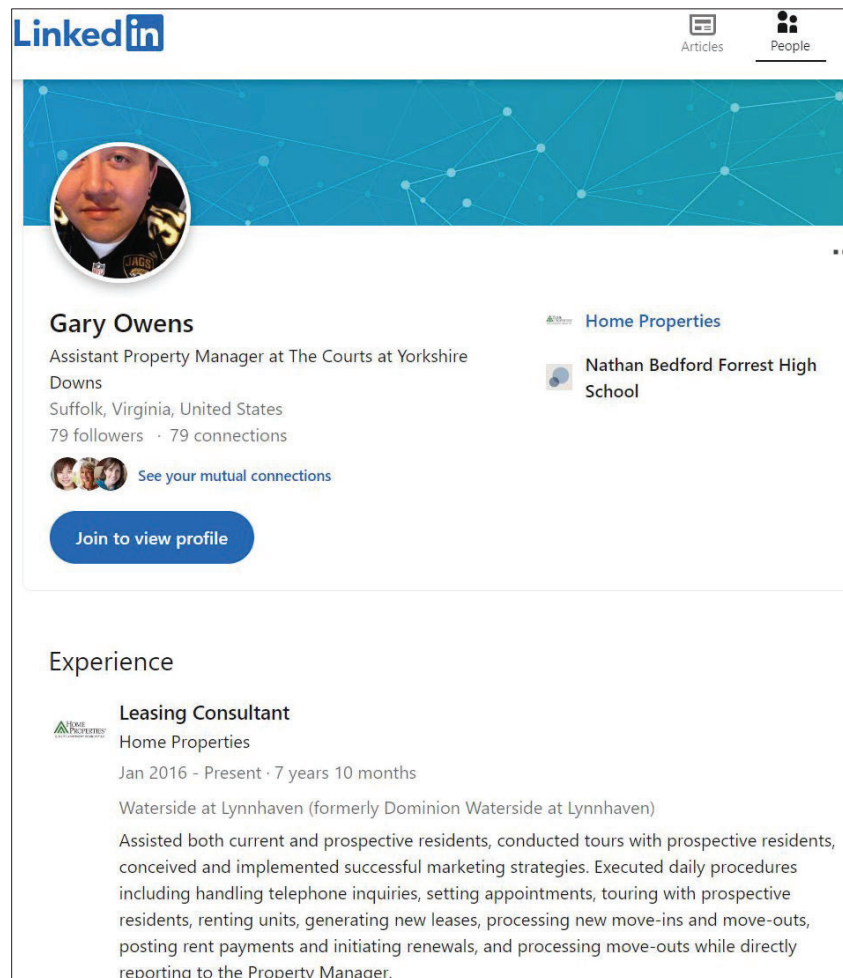
43. After obtaining this information, on or about October 17, 2023, a member of the CEHTTF accessed LinkedIn<sup>5</sup> and located a profile for OWENS. The profile indicated that

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<sup>4</sup> UTC stands for Coordinated Universal Time.

<sup>5</sup> LinkedIn” is a website on which people create profiles detailing their professional experiences and employment information, typically for professional networking purposes.

OWENS was the Assistant Property Manager at the Courts at Yorkshire Downs. A screenshot of this account is shown below.



44. During this investigation, the CEHTTF obtained OWENS' Virginia driver's license information, including his driver's license picture. I have reviewed this picture, and I believe the person shown in the LinkedIn profile picture above is the same person shown in OWEN's driver's license picture. Specifically, both pictures show a white male with ear piercings and a round mole on the side of the nose. Both pictures are shown below for comparison.



*Search of OWENS' Residence and iPad*

45. On February 29, 2024, the Honorable United States Magistrate Judge Ivan D. Davis of the Eastern District of Virginia issued a search warrant for OWENS' person, residence, and vehicle. On March 5, 2024, FBI personnel (including your affiant) executed this search warrant; several digital devices, including an iPad, were seized. I also briefly interviewed OWENS, and he is the individual depicted in the LinkedIn and driver's license photos provided above.

46. FBI personnel used a forensic tool to extract the contents of the iPad for my further review. While reviewing this data, I identified several items that indicated that the iPad belonged to OWENS. For example, some of the messages contained in the iPad were from Facebook Messenger. The account display name for the messages sent from the iPad was "Gary Owens Jr." Additionally, information for two credit cards was stored on the iPad. The name on both of these cards was "Gary Owens Jr." Finally, the Apple ID associated with the iPad was the email address thehazardoflove@aol.com. During my review of the iPad, I found numerous emails to this email address, including one sent on or about February 25, 2024, from

orders@eat.grubhub.com. This email stated, in relevant part, “*ETA 10:51 AM to [the Suffolk Residence] Thank you for ordering, Gary Owens.*” As described above, the Suffolk Residence is OWENS’ residence. Accordingly, I submit there is probable cause to believe the iPad discussed herein belonged to OWENS.

47. OWENS’ iPad was manufactured in China. During my review of OWENS’ iPad, I conducted a physical examination of the device. The text on the back of OWENS’ iPad reads, “*Designed by Apple in California. Assembled in China.*” Accordingly, I submit there is probable cause to believe OWENS committed the acts described herein while using an iPad that was assembled outside of the United States and is therefore a facility of foreign commerce.

48. Also, during my review of the data extracted from the iPad, I located the Kik application. Within the Kik application, I identified more than 300 Kik conversations, most of which had been deleted but subsequently recovered by the forensic tool used to extract the data from the iPad. I reviewed each of these conversations. Based on my review, I identified numerous conversations in which the operator of the iPad (whom I believe to be OWENS) posed as JANE DOE while communicating with males who appear to be minors.

49. During this review, I also located several items associated with JANE DOE. For example, I found an undated Google search for “j[Redacted] s[Redacted]” and internet history that indicated the user of the iPad navigated to a page of nudostar.com,<sup>6</sup> which was titled, “Others – [JANE DOE]...”<sup>7</sup> Another web history item indicated the user of the iPad navigated to a pornographic webpage listing JANE DOE. Finally, I found information associated with the Kik

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<sup>6</sup> Nudostar.com is an adult pornography website.

<sup>7</sup> The redacted name, JANE DOE, is the real name of “J[Redacted] S[Redacted].”

user account “misslincon,” along with a password that OWENS also used for other accounts on the iPad.

50. OWENS’ iPad had many applications installed on it. One of those applications was “Calculator%,” which is an application whose icon on the iPad screen appears to indicate that the application is a normal calculator. However, this application is actually used to store files, including pictures and videos. I know, based on training and experience, that people who have a sexual interest in minors often use applications like this one to hide their child pornography files. When FBI personnel accessed this application on OWENS’ iPad, six folders inside the application were located. These folders were entitled, “[JANE DOE’S FIRST NAME],” “2019,” “2020,” “2021,” “2022,” and “2023.”

51. I reviewed the “Jessica” folder in the Calculator% application on OWENS’ iPad and identified approximately 207 files, including pictures and videos. Most of these files show JANE DOE in some stage of undress or engaged in a sex act. Some of these files appear to be the same files that OWENS had previously sent to MV1 while OWENS catfished MV1. Based on this information, I believe the “Jessica” folder was OWENS’ cache of files he used while catfishing minors as JANE DOE

52. I also reviewed the “2022” folder in the Calculator% application on OWENS’ iPad and identified approximately 904 files, including pictures and videos. Most of these files show males in some stage of undress or engaged in a sex act, including masturbation. Within these 904 files, I found several pictures and videos of MV1, including videos in which MV1 uses his hand to manipulate his penis while his underwear is still on. Based on this information, I believe the “2022” folder is the folder in which OWENS maintained the pictures and videos he obtained in the year 2022 from his catfishing scheme.

53. The “2019,” “2020,” “2021,” and “2023” folders contained similar content as the “2022” folder. Accordingly, I believe OWENS created folders that correlated to the years he conducted this scheme and that he maintained the pictures and videos he obtained in those years in the corresponding folder within the Calculator% application.

54. One of the Kik conversations I found on OWENS’ iPad was his conversation with MV1. The Kik conversation between MV1 and OWENS on OWENS’ iPad contained more data than the version I found on MV1’s phone. Specifically, the conversation on OWENS’ iPad began on February 20, 2022, and ended on October 31, 2022.<sup>8</sup> In February 2022, when this conversation began, MV1 was 16 years old. From February to October 2022, OWENS “catfished” MV1 while posing as JANE DOE

55. In addition to the conversation between OWENS and MV1, I located many additional chats OWENS had with minors while OWENS catfished them as JANE DOE. Some of those chats are described below.

#### *Minor Victim 2*

56. One of the Kik conversations in OWENS’ iPad involved a minor male identified in this investigation as “Minor Victim 2” or “MV2.” The Kik conversation between OWENS and MV2 began on December 31, 2021, and ended on September 19, 2022. At the beginning of this conversation, MV2 was 16 years old, and at the end of the conversation he was 17 years old. A relevant portion of this conversation is shown below.

Minor Victim 2: *If we get started now, I’ll call you mommy*

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<sup>8</sup> The portion of this conversation that occurred on October 31, 2022, and is shown on OWENS’ iPad matches the portion of the conversation that I found on MV1’s phone.

OWENS<sup>9</sup>: *lol you really wanna do this*

OWENS: *why*

Minor Victim 2: *Yeah let's do it*

Minor Victim 2: *I'm just in that mood*

OWENS: *show me*

57. At OWENS' direction, MV2 sent a media file to OWENS. The thumbnail<sup>10</sup> image associated with this file appears to depict a male standing in a bathtub. In the picture, the male's hand is grasping his erect penis. After MV2 sent this file, the conversation continued as shown below.

Minor Victim 2: *This kind of mood*

OWENS: *good boy. More chest and abs*

Minor Victim 2: *Then send something*

OWENS: *you want me from the back*

58. Minor Victim 2 then sent a media file to OWENS. The thumbnail image associated with this file shows a male's bare torso. After MV2 sent this file, the conversation continued as shown below.

Minor Victim 2: *You're damn right I do*

Minor Victim 2: *It's sending*

OWENS: *how deep can you go bby*

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<sup>9</sup> Based on the information provided above, for the remainder of this affidavit, in transcripts of chats, the "misslincon" Kik account is attributed to OWENS.

<sup>10</sup> Because this Kik chat was deleted from OWENS' iPad and then recovered by the forensic tool used to extract the iPad's data, the chat thread itself only contains thumbnail images of media files sent within the chat, even if that media file was a video in the original conversation.

OWENS: *ok*

Minor Victim 2: *As deep as you'll let me*

59. Minor Victim 2 then sent a media file to OWENS. The thumbnail of this media file shows a male's hand grasping his erect penis. In response to that file, OWENS said, "*let it flop around lemme admire you.*" At OWENS' direction, MV2 sent another media file. The thumbnail image associated with this file shows a male's erect penis while the male's hand grasps the base of his erect penis. In response to that file, OWENS said, "*no hands bby. be natural.*" Minor Victim 2 then said, "*Send me some of you.*" Then, at OWENS' direction, MV2 sent another media file to OWENS. The thumbnail of this media file shows a male's erect penis with no hands in the picture.

60. Approximately three months later, the Kik conversation between OWENS and MV2 began again. A portion of this conversation is shown below.

OWENS: *show me how you fuck*

Minor Victim 2: *How do you want me to do that*

OWENS: *video bby. fuck ur pillow*

61. At OWENS' direction, MV2 sent another media file to OWENS. The thumbnail associated with this media file shows the tip of a male's penis next to a pillow. After MV2 sent this file, OWENS said, "*lemme see ur balls bby*" and "*lay back open ur legs.*" At OWENS' direction, MV2 sent another media file to OWENS. The thumbnail associated with this file shows a male's legs and scrotum.

62. Approximately three minutes later, OWENS said, "*jerk it more bby.*" At OWENS' direction, MV2 sent another media file. The thumbnail of this media file shows a male's hand grasping his erect penis.



63. A member of the CEHTTF identified MV2 as a now 19-year-old male who lives in Redding, California. On or about May 2, 2024, an FBI Special Agent assigned to the Sacramento Field Office interviewed MV2. During that interview, MV2 confirmed that he was the person in the conversation described above and that he created these files at the direction of the person with whom he was chatting in Kik, whom MV2 believed to be a female.

64. Minor Victim 2 advised that he sent several photos and videos to this person in Kik, and four or five of the videos he sent were of him masturbating.

65. Accordingly, I submit there is probable cause to believe that OWENS posed as JANE DOE to catfish MV2 and to persuade MV2 to produce child pornography, which OWENS further persuaded MV2 to send to OWENS.

*Minor Victim 8<sup>11</sup>*

66. One of the Kik conversations in OWENS' iPad involved a minor male identified in this investigation as "Minor Victim 8" or "MV8." The Kik conversation between OWENS and MV8 began on February 22, 2022, and ended on February 24, 2022. At the time of this conversation, MV8 was 15 years old. A relevant portion of this conversation is shown below.

Minor Victim 8: *Anyways can I get a booty pic*

OWENS: *lamo oh fr*

Minor Victim 8: *Bruhaps*

OWENS: *lol you ever sent before*

Minor Victim 8: *Ye*

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<sup>11</sup> The minor victim numbers in this affidavit are not consecutive because I have not included all identified minor victims in this affidavit for the sake of brevity. However, minor victim numbers have been and will continue to be used throughout this investigation for various purposes. Accordingly, I have used those minor victim numbers for the purposes of consistency throughout this investigation and for later reference.

OWENS: *haha wait how old you is*

Minor Victim 8: *15*

OWENS: *okay me too lol good u a virgin*

Minor Victim 8: *Yes ma'am*

Minor Victim 8: *You?*

OWENS: *nice and i've done a little bit but not much lol have you ever done anything*

67. The conversation continued for approximately nine more minutes, and then the follow exchange occurred.

Minor Victim 8: *Anyways you tryna send*

OWENS: *lol idk if i got in the mood to i could.*

OWENS: *you ever been submissive*

OWENS: *lol*

Minor Victim 8: *Shit maybe like how so*

OWENS: *like i command you to do stuff and you do it and you get rewarded when i say you do good but it's only like for serious ppl lol*

Minor Victim 8: *Lmao kinda like a dog*

Minor Victim 8: *You wanna do that?*

OWENS: *I mean not like a dog but if you want to we can it's up to you*

Minor Victim 8: *Like I'm just trying to see some titties*

OWENS: *lol well you could i just gotta know you're down to have fun too*

Minor Victim 8: *Don't girls like find dick pics gross*

OWENS: *nope haha have u ever sent one before*

68. OWENS continued to talk to MV8 and learned that MV8 was wearing underwear. OWENS then sent a message to MV8 that said, “*lemme see u slide ur undies odd all the way abs then rub ur dock.*”<sup>12</sup> At OWENS’ direction, MV8 sent a media file to OWENS. The thumbnail image associated with this file shows a male’s torso, groin, and legs while the male’s penis is partially protruding beyond the top of the male’s grey underwear with green stitching.

69. After reviewing this thumbnail, I performed a manual review of the “2022” folder in OWENS’ iPad and located a video file, the beginning frame of which matches the thumbnail described above. I watched this video, which lasts 10 seconds, in its entirety. In the video, the male pushes his underwear down, thus exposing his entire penis, which is erect. The male then uses his hand to masturbate his erect penis. In the video, a scar can be seen on the male’s wrist. After MV8 sent this file, the conversation continued as shown below.

Minor Victim 8: *Don’t mind the scar on my wrist I broke my arm and had to have a pin sticking out of it*

OWENS: *i love it tbh*

70. OWENS’ conversation with MV8 continued, and MV8 sent additional sexually explicit media files of himself to OWENS.

71. A member of the CEHTTF identified MV8 as a now 17-year-old male who resides in Chesapeake, Virginia, within the Eastern District of Virginia.

72. Accordingly, I submit there is probable cause to believe that OWENS posed as JANE DOE to catfish MV8 and to persuade MV8 to produce child pornography, which OWENS further persuaded MV8 to send to OWENS.

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<sup>12</sup> I believe this message contained several typographical errors. I believe OWENS meant to type “*lemme see u slide ur undies off all the way and then rub ur cock.*”

*Minor Victim 9*

73. One of the Kik conversations in OWENS' iPad involved a minor male identified in this investigation as "Minor Victim 9" or "MV9." The Kik conversation between OWENS and MV9 began on October 28, 2022, and ended on December 4, 2022. At the time of this conversation, MV9 was 15 years old. A relevant portion of this conversation is shown below.

OWENS: *you ever sent before*

Minor Victim 9: *yep*

Minor Victim 9: *do you want some of this rn?*

OWENS: *lemme watch you strip bby*

OWENS: *close up*

Minor Victim 9: *ooo can i see some of you after?*

OWENS: *you might get a reward if it's good and sexy babe*

Minor Victim 9: *lemme get nice a hard for rq*

OWENS: *it can be soft too idc*

74. At OWENS' direction, MV9 sent a media file to OWENS. The thumbnail image associated with this file shows a male's torso with the top of his underwear also shown. The male's underwear is dark in color with a waistband that is light blue with the words, "Go Buck Naked" stitched on it in black letters.

75. After reviewing this thumbnail, I performed a manual review of the "2022" folder in OWENS' iPad and located a video file, the beginning frame of which matches the thumbnail described above. I watched this video, which lasts 22 seconds, in its entirety. In the video, the male pushes his underwear down, thus exposing his erect penis. The male then uses his hand to masturbate his penis. After MV9 sent this file, the conversation continued as shown below.

Minor Victim 9: *just for you bby*

OWENS: *omg it looks huge*

OWENS: *get closer and naked bby i wanna see the undies come off*

76. Approximately three days later, OWENS' conversation with MV9 continued as shown below in relevant part.

OWENS: *give me a close up tour of ur balls and ass bby*

Minor Victim 9: *ofc bby*

OWENS: *good boy*

77. Minor Victim 9 then sent a media file to OWENS. The thumbnail of this media file shown in the deleted chat (recovered from OWENS' iPad) shows a male's midsection, including his erect penis. Minor Victim 9 then sent another media file to OWENS. The thumbnail of this file is completely black. The conversation then continued as shown below.

Minor Victim 9: *the ass angle was pretty hard*

OWENS: *just need to lay on ur back and put ur legs up*

Minor Victim 9: *do you want another video?*

OWENS: *yeah bby*

Minor Victim 9: *ok*

OWENS: *ok*

78. At OWENS' direction, MV9 sent another media file to OWENS. The thumbnail for this media file shows a male's exposed anus and scrotum. After MV9 sent this file, the conversation continued as shown below.

Minor Victim 9: *better bby?*

OWENS: *yessss bby*

OWENS: *can i lick it*

79. OWENS' conversation with MV9 continued in this fashion. OWENS sent additional messages to MV9 in which he sought to persuade MV9 to create sexually explicit material. For example, in various messages to MV9, OWENS said, "*lemme watch u jerk ur big cock bby,*" "*csn i watch you cum all over ur chest and face babe,*" and "*if you cum record it bby.*"

80. A member of the CEHTTF identified MV9 as a now 17-year-old male who lives in Yorktown, Virginia, in the Eastern District of Virginia.

81. Accordingly, I submit there is probable cause to believe that OWENS posed as JANE DOE to catfish MV9 and to persuade MV9 to produce child pornography, which OWENS further persuaded MV9 to send to OWENS.

*Minor Victim 10*

82. One of the Kik conversations in OWENS' iPad involved a minor male identified in this investigation as "Minor Victim 10" or "MV10." The Kik conversation between OWENS and MV10 began and ended on October 3, 2022. At the time of this conversation, MV10 was 16 years old. A relevant portion of this conversation is shown below.

OWENS: *and wait ur older than me lol when's ur bday*

Minor Victim 10: *November 29, 2005*

OWENS: *damn december 15th 2005 haha*

83. The conversation later continued as shown below.

OWENS: *you should make me a video. go head to toe babe give me a body tour*

OWENS: *if you do my stuff and let me dominate you i might show a little for you*

84. Minor Victim 10 then sent a media file to OWENS. The thumbnail of this media file does not show anyone in it. I reviewed the “2022” folder in OWENS’ iPad for a file that matched this thumbnail, but I did not find any such file. After receiving this file, OWENS said, *“lemme see those undies come off and ur legs open for me.”*

85. At OWENS’ direction, MV10 send a media file to OWENS. The thumbnail for this media file shows a male’s erect penis with a hand grasping the erect penis. After OWENS received the media file associated with this thumbnail, the conversation continued as shown below.

OWENS: *damn babe.*

OWENS: *ur balls full lemme see*

86. At OWENS’ direction, MV10 sent a media file to OWENS. The thumbnail image associated with this file shows a male’s erect penis with a hand grasping the penis.

87. After reviewing this thumbnail, I performed a manual review of the “2022” folder in OWENS’ iPad and located a video file, the beginning frame of which matches the thumbnail described above. I watched this video, which lasts 15 seconds, in its entirety. In the video, the male uses his hand to masturbate his erect penis and to manipulate his testicles while the camera focuses on the male’s genitalia.

88. Approximately 14 minutes later, the conversation continued.

OWENS: *lol just cum lemme watc babe*

OWENS: *i’ll imagine you doing it inside me*

89. At OWENS’ direction, MV10 sent a media file to OWENS. The thumbnail image associated with this file shows what appears to be a grey bedsheet and a black blanket with portions of a person’s legs visible at the left side of the thumbnail.

90. After reviewing this thumbnail, I performed a manual review of the “2022” folder in OWENS’ iPad and located a video file, the beginning frame of which matches the thumbnail described above. I watched this video, which lasts 3 seconds, in its entirety. In the video, the male uses his hand to masturbate his erect penis.

91. A member of the CEHTTF identified MV10 as a now 18-year-old male who lives in Virginia Beach, Virginia, in the Eastern District of Virginia.

92. Accordingly, I submit there is probable cause to believe that OWENS posed as JANE DOE to catfish MV10 and to persuade MV10 to produce child pornography, which OWENS further persuaded MV10 to send to OWENS.

*Minor Victim 11*

93. One of the Kik conversations in OWENS’ iPad involved a minor male identified in this investigation as “Minor Victim 11” or “MV11.” The Kik conversation between OWENS and MV11 began on August 16, 2022, and ended on August 20, 2022. At the time of this conversation, MV11 was 17 years old. A relevant portion of this conversation is shown below.

OWENS: *hey*

Minor Victim 11: *Sup*

OWENS: *wyd*

Minor Victim 11: *Talking to you*

OWENS: *still got a boner*

Minor Victim 11: *Ofc*

94. OWENS then sent a picture to MV11. This picture is the same as one of the pictures OWENS sent to MV1 described above. This picture shows a nude white female with her



breasts and torso exposed. A small portion of the female's face and the top of her pubic area can be seen in the picture. The conversation then continued as follows:

Minor Victim 11: *Definitely*

OWENS: *how so you should show me*

95. At OWENS' direction, MV11 sent a picture to OWENS. In this picture, a male's hand is shown holding his erect penis. After MV11 sent this picture to OWENS, the conversation continued as shown below.

OWENS: *fuck it's huge*

OWENS: *wanna slide it in me*

Minor Victim 11: *If only you were here*

OWENS: *lemme watch u jerk it bby*

96. At OWENS' direction, MV11 sent a media file to OWENS. The thumbnail for this media file shows a male's hand grasping his erect penis. I performed a manual review of the "2022" folder in OWENS' iPad and located a video file, the beginning frame of which matches the thumbnail described above. I watched this video, which lasts 5 seconds, in its entirety. In the video, the male uses his hand to masturbate his erect penis.

97. A member of the CEHTTF identified MV11 as a now 19-year-old male who lives in Virginia Beach, Virginia, in the Eastern District of Virginia.

98. Accordingly, I submit there is probable cause to believe that OWENS posed as JANE DOE to catfish MV11 and to persuade MV11 to produce child pornography, which OWENS further persuaded MV11 to send to OWENS.

*Minor Victim 12*

99. One of the Kik conversations in OWENS' iPad involved a minor male identified in this investigation as "Minor Victim 12" or "MV12." The Kik conversation between OWENS and MV12 began and ended on November 29, 2022. At the time of this conversation, MV12 was 16 years old. A relevant portion of this conversation is shown below.

OWENS: *lemme see ur undies close up, in a video. rubbing ur thighs if u want*

Minor Victim 12: *lmaooooo do u j want to see it?*

OWENS: *no lol*

OWENS: *i like being teased*

Minor Victim 12: *parents literally took my door off ion want to turn the light on again*

Minor Victim 12: *i'll use flash ig lol*

OWENS: *ugh lol*

Minor Victim 12: *i ain't hard tho lol*

OWENS: *that's fine babe*

100. At OWENS' direction, MV12 sent a media file to OWENS. The thumbnail for this media file shows a pair of black underwear with grey trim. I performed a manual review of the "2022" folder in OWENS' iPad and located a video file, the beginning frame of which matches the thumbnail described above. I watched this video, which lasts 15 seconds, in its entirety. In the video, a male uses his hand to manipulate his penis over his underwear. Later in the same conversation, the following messages were exchanged.

OWENS: *hard now?*

Minor Victim 12: *idkkkk not quite*

Minor Victim 12: *could use a little more help*

OWENS: *show me daddy*

101. At OWENS' direction, MV12 then sent a media file to OWENS. The thumbnail for this media file shows a male grasping his erect penis with his hand. I performed a manual review of the "2022" folder in OWENS' iPad and located a video file, the beginning frame of which matches the thumbnail described above. I watched this video, which lasts 11 seconds, in its entirety. In the video, a male uses his hand to masturbate his erect penis.

102. A member of the CEHTTF identified MV12 as a now 18-year-old male who lives in Yorktown, Virginia, in the Eastern District of Virginia.

103. Accordingly, I submit there is probable cause to believe that OWENS posed as JANE DOE to catfish MV12 and to persuade MV12 to produce child pornography, which OWENS further persuaded MV12 to send to OWENS.

*Minor Victim 13*

104. In some of his Kik conversations with minors, OWENS attempted to persuade the minors to perform sexual acts with other minors. One such conversation occurred when OWENS catfished a minor male identified in this investigation as "Minor Victim 13" or "MV13." The Kik conversation between OWENS and MV13 began on July 11, 2022, and ended on November 17, 2022. At the time of this conversation, MV13 was 17 years old. As shown below, MV13 told OWENS that he (MV13) had a 13-year-old brother. A relevant portion of the conversation is shown below.

OWENS: *lemme see ur undies rn*

Minor Victim 13: *I'm not even in my room nothing rn*

OWENS: *so what lol you by yourself right*

Minor Victim 13: *Lls nah I'm in the living room my lil brother on the floor*

OWENS: *how old is he*

Minor Victim 13: *13lls*

OWENS: *shot y'all wanna tag team me lol*

Minor Victim 13: *with whatever having you crawling*

Minor Victim 13: *Have*

OWENS: *he horny too fr fr?*

Minor Victim 13: *Huh ?*

OWENS: *your bro*

OWENS: *you and him can tag team me*

Minor Victim 13: *He with whatever I already know*

OWENS: *what lol*

Minor Victim 13: *does he have kik or inta lol*

Minor Victim 13: *Lls no*

OWENS: *well if you both wanna see me we can maybe arrange something*

Minor Victim 13: *I'm with it*

OWENS: *ok take a pic of him rq*

Minor Victim 13: *Ngl he slump*

OWENS: *lemme see haha*

Minor Victim 13: *he looks wild*

OWENS: *lol ok*

105. Minor Victim 13 sent OWENS a picture of a minor male who appears to be asleep with his mouth open. The conversation then continued as shown below.

OWENS: *is he drooling lol*

Minor Victim 13: *Idek*

OWENS: *you should put ur d on his forehead lol*

Minor Victim 13: *Noooo*

OWENS: *i'll show u sum if you do*

106. A member of the CEHTTF identified MV13 as a now 18-year-old male who lives in Brandywine, Maryland.

107. Accordingly, I submit there is probable cause to believe that OWENS posed as JANE DOE to catfish MV13 and attempted to persuade MV13 to engage in a lewd and lascivious display of the genitals with MV13's sleeping 13-year-old brother as described above.

### **Summary**

108. In summary, I submit there is probable cause to believe that OWENS used the messaging application Kik, which utilizes the internet for communications, and an Apple iPad that was manufactured in China to catfish minor males and thus to persuade those minor males to engage in sexual activity and produce child pornography at OWENS' direction. OWENS then further utilized the same means to persuade those minor males to send that child pornography to OWENS.

109. As of May 4, 2024, the FBI has identified 13 minors against whom OWENS perpetrated this scheme. The FBI is continuing to identify potential additional minor victims. As of May 4, 2024, there are at least 51 additional potential victims that have not yet been fully identified.

### **CONCLUSION**

110. Based on the foregoing, I submit that there is probable cause to believe that between on or about February 20, 2022, and on or about October 31, 2022, while residing in the

Eastern District of Virginia, OWENS used an Internet-enabled messaging application to knowingly persuade, induce, entice, and/or coerce MV1, a minor under the age of eighteen-years-old located in the Eastern District of Virginia, to produce child pornography.

Furthermore, on or about October 31, 2022, OWENS employed, used, persuaded, induced, enticed, and/or coerced MV1, a minor under the age of eighteen (who also resided in the Eastern District of Virginia), to engage in sexually explicit conduct for the purpose of producing a sexual depiction of such conduct. I respectfully request that a criminal complaint be issued for OWENS.

Respectfully submitted,

*Matthew Lee*

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Matthew E. Lee, Special Agent  
Federal Bureau of Investigation

Respectfully submitted and attested to in accordance with the requirements of Fed. R. Crim. P. 4.1 via telephone on May 21, 2024.

*Robert J. Krask*

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UNITED STATES MAGISTRATE JUDGE

The Honorable Robert J. Krask  
United States Magistrate Judge